

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company,

Plaintiffs,

v.

Jules Parisien, M.D. et al.,

Defendants.

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Case No. 1:18-cv-00289-ILG-ST

**PLAINTIFFS’ NOTICE OF
MOTION FOR PRELIMINARY
INJUNCTION AND STAY**

PLEASE TAKE NOTICE that upon the attached Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Injunction and Stay, dated January 19, 2018, and the exhibits attached thereto, and upon all prior pleadings and proceedings herein, Plaintiffs State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company will move this Court before the Honorable I. Leo Glasser, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, for an Order pursuant to Federal Rules of Civil Procedure 13(a) and 65:

- 1) temporarily staying all arbitrations pending before the American Arbitration Association between State Farm Mutual and/or State Farm Fire and Defendants seeking No-Fault insurance benefits related to services or supplies provided by Defendants;
- 2) temporarily staying all lawsuits pending in the state courts of New York between State Farm Mutual and/or State Farm Fire and Defendants seeking No-Fault insurance benefits related to services or supplies provided by Defendants; and
- 3) temporarily enjoining Defendants from commencing any new arbitration or New York state court proceedings against State Farm Mutual and/or State Farm Fire seeking No-Fault insurance benefits related to services or supplies provided by Defendants until the resolution of the instant litigation.

Dated: January 19, 2018
Chicago, Illinois

KATTEN MUCHIN ROSENMAN LLP

By: 
Ross O. Silverman (NY Bar No. 4147922)
Jonathan L. Marks (NY Bar No. 5462874)
Patrick C. Harrigan (motion for *pro hac vice*
to be filed)
Anne Raven (motion for *pro hac vice* to be
filed)
Silké G. Watson (motion for *pro hac vice* to
be filed)
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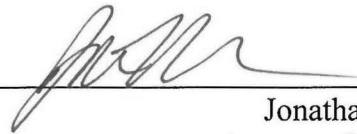
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*Attorneys for Plaintiffs State Farm Mutual
Automobile Insurance Company and State
Farm Fire and Casualty Company*

CERTIFICATE OF SERVICE

I hereby attest that I have caused the foregoing paper to be placed in the custody of a process server, who will attempt service on Defendants,¹ simultaneously with service of the Summons, Complaint and Amended Complaint. Furthermore, I caused copies of the foregoing paper to be placed in the United States Mail addressed to the last known address of the Defendants.

By: _____



Jonathan L. Marks
Attorney for Plaintiffs

¹ Defendants include: (1) Jules Parisien, M.D., (2) Noel Blackman, M.D., (3) Luqman Dabiri, M.D., (4) Ksenia Pavlova, D.O., (5) Frances Lacina, D.O., (6) Allay Medical Services, P.C., (7) JFL Medical Care P.C., (8) FJL Medical Services P.C., (9) JPF Medical Services, P.C., (10) KP Medical Care P.C., (11) PFJ Medical Care P.C., (12) RA Medical Services, (13) Darren T. Mollo, D.C., (14) Darren Mollo D.C., P.C., (15) ACH Chiropractic, P.C., (16) Energy Chiropractic, P.C., (17) Island Life Chiropractic Pain Care, PLLC, (18) Charles Deng, L.A.c, (19) Charles Deng Acupuncture, P.C., (20) David Mariano, P.T., and (21) MSB Physical Therapy P.C., (22) Maiga Products Corporation, (23) Madison Products of USA, Inc., (24) Quality Custom Medical Supply, Inc., (25) Quality Health Supply Corp., (26) AB Quality Health Supply Corp., and (27) Personal Home Care Products Corp.